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February 19, 2020

By ECF

Honorable P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Ramon Ramirez

~~19 CR 395 (PKC)~~ 19 CR 395 (PKC)

*Application
GRANTED
SO ORDERED
S. Morales
USDJ
2-19-20*

Dear Judge Castel,

I am the attorney assigned to represent Ramon Ramirez pursuant to the Criminal Justice Act. Mr. Ramirez is charged with engaging in a "murder-for-hire" conspiracy in violation of 18 U.S.C. §1958. Trial in this matter is scheduled to begin on April 6, 2020. I write now, pursuant to the Criminal Justice Act, 18 U.S.C. § 3006A(e)(1) as well as the CJA Policies and Procedures Manual of the Second Circuit, to respectfully request authorization to retain the services of Jodi Morales, Esq. as an associate to assist the defense in the preparation and defense of this matter.

The charges in this case are serious and at this point, trial appears imminent. Before going into private practice, Ms. Morales worked as an attorney for the respected Bronx Defenders for almost ten years. She is currently a CJA Mentee in the Southern District and has been assigned as an associate on other matters in this District as well. Under the watchful eye of CJA counsel, Ms. Morales has the necessary skills and experience to act as associate counsel in this matter.

The presumptive rate in this Circuit for associates is \$80 - \$90 per hour. (See CJA Manual Chapter II, Section (A)(1)(c)). [In light of Ms. Morales' qualifications and experience, I respectfully request authorization to compensate her at a rate of \$90 per hour. Because this appears to be a trial matter, I respectfully request that the Court authorize \$9,000 for an anticipated 100-hours of work.] Should additional time become necessary, I will seek further authorization from the Court at that time.

OK

Mr. Ramirez has previously submitted a financial affidavit demonstrating his inability to pay for legal services and costs, and is similarly without the resources to retain the services of an associate to assist in his defense. Accordingly, the defense respectfully asks the Court to authorize the funds requested herein. Finally, given the nature of this request, the defense has not sought the position of the Government concerning this request.

Thank you.

Respectfully,

/s/ Matthew J. Kluger
Matthew J. Kluger

cc: CJA Case-Budgeting Attorney, Jerry L. Tritz (email)
All parties via ECF